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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIANE ST. CLAIR,

Plaintiff,

vs.

ENERGIZER, INC.; GC SERVICES LIMITED
PARTNERSHIP; TELEPERFORMANCE
BUSINESS SERVICES US, LLC; ALORICA,
INC.; and DOES 1-5,

Defendants.

Case No. 2:20-cv-01880-GMN-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Plaintiff Diane St. Clair, and Teleperformance Business Services US, LLC (TBS), stipulate and agree that TBS shall have an additional eighteen (18) days, up to and including **November 20, 2020**, to file its response to the plaintiff's complaint, which was currently due on November 2, 2020. The complaint was filed on October 8, 2020.

Good cause exists to grant the requested extension. Undersigned counsel was only recently retained and requests the extension so it can have an opportunity to adequately review and respond to the complaint. The failure to file this request prior to the deadline is the result of excusable neglect, as counsel was only just retained and reached out to request the extension as soon as it learned of the deadline.

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1 This is the parties' first request for an extension of this deadline, and is not intended to cause
2 any delay or prejudice to any party.

3 DATED this 5th day of November, 2020.

AKERMAN LLP	PRICE LAW GROUP
<p>4 <u>/s/ Natalie L. Winslow</u></p> <p>5 NATALIE L. WINSLOW, ESQ.</p> <p>6 Nevada Bar No. 12125</p> <p>7 JAMIE K. COMBS, ESQ.</p> <p>8 Nevada Bar No. 13088</p> <p>9 1635 Village Center Circle, Suite 200</p> <p>10 Las Vegas, NV 89134</p> <p>11 <i>Attorneys for Teleperformance Business Services</i></p> <p>12 <i>US, LLC</i></p>	<p>4 <u>/s/ Steven A. Alpert</u></p> <p>5 STEVEN A. ALPERT, ESQ.</p> <p>6 Nevada Bar No. 8353</p> <p>7 5940 S. Rainbow Boulevard, Suite 3014</p> <p>8 Las Vegas, NV 89118</p> <p>9 <i>Attorneys for Diane St. Clair</i></p>

13 IT IS SO ORDERED



14 UNITED STATES MAGISTRATE JUDGE

15 11-6-2020

16 DATED: _____

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